



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

OCT 31 2016

REPLY TO THE ATTENTION OF:
AT-18J

Ms. Gail Good
Director, Bureau of Air Management
Wisconsin Department of Natural Resources
P.O. Box 7921
Madison, Wisconsin 53707-7921

Dear Ms. Good:

The U.S. Environmental Protection Agency has reviewed the Wisconsin Department of Natural Resources' 2017 Annual Air Monitoring Network Plan and approves the plan and proposed changes to your network of air quality monitors, but for the following:

Ozone Monitoring Season Waiver/Petition for Reconsideration: With the revision of the ozone NAAQS in October, 2015, EPA extended Wisconsin's ozone monitoring season from March 1 through October 15 (40 CFR Part 58, Section 4.1(i)). WDNR submitted a Petition for Reconsideration to Gina McCarthy on December 18, 2015, which included a request to shorten Wisconsin's ozone season. Until the Petition for Reconsideration has been acted on, WDNR must plan to monitor for ozone, statewide, during the required ozone season in effect January 1, 2017. EPA's approval of Wisconsin's 2017 Annual Air Monitoring Network Plan does not constitute approval of the shortened ozone season requested by the State of Wisconsin.

NO₂ Area-Wide Monitoring Requirement: 40 CFR Part 58, Appendix D, Section 4.3 requires the Milwaukee-Waukesha-West Allis metropolitan statistical area to operate two NO₂ monitoring sites. One site should be collocated with a near-road site and a second representative of area-wide NO₂ emissions. Wisconsin meets the near-road NO₂ monitoring requirement with the College Avenue near-road station and the area-wide monitoring requirement with the NO₂ monitoring conducted at the Photochemical Air Monitoring Station (PAMS) site at Southeast Regional office (SER/DNR). Therefore, Wisconsin may discontinue/shut-down the PAMS monitor at SER/DNR with the exception of the NO₂ monitor.

EPA evaluated the plan, as well as information about monitoring sites submitted to the Air Quality System database, and confirmed, with the above exceptions, that your network meets the operational requirements of 40 CFR Part 58.

We acknowledge and approve the following specific modifications included in WDNR's annual network plan:

Relocation of PM2.5 Monitor from Milwaukee-Fire Station (55-079-0056) to Near-Road Site at Milwaukee-College Avenue (55-079-0056): WDNR proposed to relocate the currently operating PM2.5 monitor from the Milwaukee Fire Station to the existing near-road site located at College Avenue to meet PM2.5 monitoring requirements at the near-road location.

Meteorological Towers – Shut-Downs and Tower Height Waivers: Meteorological towers are only required at NCore (40 CFR Part 58, Appendix D, Section 3(b)) and PAMS (40 CFR Part 58, Appendix D, Section 5.3, Table D-6). Since none of the proposed meteorological tower shut-downs and height requirement deviations are at either NCore or PAMS, a waiver is not necessary or appropriate. The Quality Assurance Handbook for Air Pollution Measurement Systems Volume IV: Meteorological Measurements Version 2.0 (Final) states that “in most cases, to accommodate wind speed/wind direction sensors, a meteorological tower must be able to reach a height of 10 meters”. This is to ensure that the wind speed/wind direction measurements are not affected by surface conditions. Meteorological tower heights less than 10 meters may cause the data to be less useful.

PAMS removal: The PAMS monitoring requirements were revised on October 16, 2015. These revisions changed network requirements for fixed PAMS and requires Enhanced Monitoring Plans (EMP) (40 CFR Part 58, Appendix D, Section 5). As a result, at this time, Wisconsin is no longer required to operate PAMS sites. However, Wisconsin may be required to develop and implement an EMP for ozone and ozone precursors for Moderate and above 8-hour ozone nonattainment areas. An EMP must be submitted to the Regional Administrator no later than October 1, 2019 or two years following the effective date of a designation classification of Moderate or above for ozone nonattainment. Elements of an EMP are outlined in 40 CFR Part 58, Appendix D, Section 5(h).

If you determine that changes to your monitoring network are needed due to unplanned circumstances or revisions to the federal ambient monitoring and quality assurance requirements, the modifications must be reviewed and approved by EPA.

EPA appreciates your partnership in conducting ambient air monitoring. We look forward to working with you to continuously improve the quality of ambient air in Wisconsin. If you have any question or comments regarding this network review, please contact Michael Compher, Air Monitoring and Analysis Section Chief, at (312) 886-5745.

Sincerely,



Edward Nam
Acting Director
Air and Radiation Division